

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Alexander Norris,

Plaintiff,

- against –

Marc Goldner, Individually and as Officer of
Golden Bell Entertainment, LLC, a California
Company and Golden Bell Studios, LLC,
Golden Bell Entertainment, LLC, a California
Company and Golden Bell Studios, LLC,

Defendants.

Civil Action No.: 1:19-cv-05491-PAE-SN

MOTION FOR STATUTORY DAMAGES AND ATTORNEYS' FEES

NOW COMES Plaintiff Alexander Norris ("Plaintiff"), by and through their undersigned attorneys, and respectfully submits this Motion For Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976.

WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law, Plaintiff respectfully requests that this Court:

1. Pursuant to 17 U.S.C. § 504(c)(1) and (c)(2), award Plaintiff \$450,000 in statutory damages;
2. Pursuant to 17 U.S.C. § 505, award Plaintiff \$273,509.49 in attorneys' fees; and
3. Award any additional relief the Court deems just and proper.

Respectfully submitted this 22nd day of December, 2023.

/s/ Christie R. McGuinness

Christie R. McGuinness

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion For Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976 was filed with the Clerk on this date and sent to all counsel via CM/ECF as follows:

Gerard Fox, Esq.
Kathryn Lunn, Esq.
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Counsel for Defendants
Marc Goldner, Golden Bell Entertainment, LLC and Golden Bell Studios, LLC

This the 22nd day of December, 2023.

/s/ Christie R. McGuinness
Christie R. McGuinness